

### REMARKS

By this Amendment, Applicants amend claims 17 and 19 to more appropriately claim Applicants' invention. No new matter is added. Claims 17-21, 24, 25, and 28 are pending in this application.

As a preliminary matter, in paragraph 3 of the Office Action dated September 11, 2003, the Examiner indicates that the title of the application is "as originally filed." However, Applicants amended the title in the Amendment filed November 13, 2002. Because the Examiner previously acknowledged Applicants' November 13, 2002 Amendment, Applicants assume the amended title was entered. If Applicants' understanding is not correct, they request that the Examiner provide clarification.

In the Office Action, the Examiner rejected claims 17-21, 24, 25, and 28 under 35 U.S.C. § 102(e) as anticipated by Ishikawa et al. (U.S. Patent No. 6,317,130). Applicants respectfully traverse the rejection.

To properly anticipate Applicants' claimed invention, the Examiner must find each and every element of the claim either expressly described, or under principles of inherency, in a single prior art reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim." See M.P.E.P. § 2121 (8<sup>th</sup> ed., Aug. 2001), *quoting* Richardson v. Suzuki Motor Co., 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). Finally, "[t]he elements must be arranged as required by the claim." M.P.E.P. § 2131 (8<sup>th</sup> ed. 2001), p. 2100-69.

Ishikawa discloses an apparatus and method for generating skeleton-based dynamic picture images. The abstract discloses visually representing a human body or animal as a model that moves naturally at portions that do not include joints and bones underlying the polygons that form the model. To do so, the model is provided with joints

and a skeletal structure. See also col. 2, lines 26-34. In other words, because an animated character does not include joints and bones under the character's form (because such features are typically not visible when the character is displayed on a display device), Ishikawa discloses providing an underlying skeletal structure, such as shown, for example, in Fig. 26. The underlying skeletal structure, which defines the character's form, provides more natural and smooth actions. See col. 2, lines 35-40.

By contrast, Applicants' claim 17 recites a combination including, among other things, "a game character model, including a reference polygon and component polygons that are separated from the reference polygon, wherein no other polygons are included between said reference polygon and said component polygons" and "a motion data table for pre-storing motion data for executing a movement of the game character model, wherein motion data includes distance data and angle data defining predetermined motions of the game character model" (emphasis added). Ishikawa does not disclose or suggest at least these features.

Instead, as noted, Ishikawa discloses using a skeletal structure to define a character's form, including defining the position of polygons that form the character. See col. 2, lines 53-58. In other words, Ishikawa, by virtue of including a skeleton with joints, includes polygons that are joined together. Accordingly, Ishikawa does not disclose or suggest "a game character model, including a reference polygon and component polygons that are separated from the reference polygon, wherein no other polygons are included between said reference polygon and said component polygons" as recited in claim 17 (emphasis added). Claim 19 includes recitations of a scope

similar to claim 17. Accordingly, the Examiner should withdraw the rejection of independent claims 17 and 19.

Each of dependent claims 18, 20, 21, 24, 25, and 28 depend from allowable claims 17 and 19 and are at least allowable due to their dependency upon their allowable base claims. Accordingly, Applicants respectfully request the Examiner to also withdraw the rejection of dependent claims 18, 20, 21, 24, 25, and 28.

**CONCLUSION**

In view of the foregoing remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

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By: Anthony Zuhdi Reg. No. 53,232  
for Richard V. Burgujian  
Reg. No. 31,744

FINNEGAN  
HENDERSON  
FARABOW  
GARRETT &  
DUNNER LLP

1300 I Street, NW  
Washington, DC 20005  
202.408.4000  
Fax 202.408.4400  
www.finnegan.com